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10  
11 UNITED STATES DISTRICT COURT  
12 EASTERN DISTRICT OF CALIFORNIA

13 MITCHELL ALLEN DOLAN,

14 Plaintiff,

15 vs.  
16

17 COMMISSIONER OF SOCIAL SECURITY,

18 Defendant.

Civil No. 2:24-cv-02005-CSK

19  
20 STIPULATION AND ~~PROPOSED~~ ORDER  
21 FOR EXTENSION OF TIME

22 IT IS HEREBY STIPULATED by and between the parties, through their undersigned  
23 attorneys, with this Court's approval, to extend the time by 50 days, from November 19, 2024 to  
24 January 7, 2025, for the Commissioner to file his Cross-Motion for Summary Judgment.  
25 Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's  
26 Cross-Motion.

27 This is the Commissioner's first request for an extension of time. Plaintiff does not  
28 oppose the requested extension.

The undersigned counsel for the Commissioner respectfully submits that good cause exists  
for the requested extension. Due to ongoing staffing fluctuations and organizational changes

counsel for the Commissioner has been tasked with additional duties including serving as a jurisdictional coordinator, reviewing other attorneys' work, training and mentoring new attorneys, and handling more cases, including the instant case, which was just reassigned to her. Counsel for the Commissioner was also out of the office for the past two weeks, and November 12, 2024 was her first day back. As a result, and despite diligent efforts to manage her workload, counsel for the Commissioner needs an extension in the instant case to review the administrative record, consider the issues that Plaintiff has raised, confer with her client as necessary, and prepare the Commissioner's Cross-Motion.

Respectfully submitted,

Dated: November 12, 2024

PIERRE PIERRE LAW, P.C.

By: /s/ Nikhil Agharkar\*

NIKHIL AGHARKAR

Attorneys for Plaintiff

[\*As authorized by e-mail by Eddy Pierre Pierre, Esq. on Nov. 12, 2024]

Dated: November 14, 2024

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Office of Program Litigation, Office 7

By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

Special Assistant United States Attorney

Attorneys for Defendant

**ORDER**

Pursuant to the parties' stipulation, IT IS SO ORDERED that the Commissioner's Cross-Motion for Summary Judgment shall be due on January 7, 2025 and Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

DATED: November 14, 2024



HON. CHI SOO KIM

UNITED STATES MAGISTRATE JUDGE

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